

NO. 4:16CR173
Judge C4 One

FILED

DEC 16 2016

Clerk, U.S. District Court
Texas Eastern

Count One

Indictment/Notice of Penalty
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known and unknown to the United States Grand Jury, to knowingly and intentionally possess with the intent to distribute one kilogram or more of a mixture or substance containing a detectable amount of heroin, a violation of 21 U.S.C. § 841(a)(1).

In violation of 21 U.S.C. § 846.

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE
Criminal Forfeiture Pursuant to 21 U.S.C. § 853

As a result of committing the offenses charged in this Indictment, the defendants shall forfeit to the United States all property, real and personal, involved in the offenses alleged or traceable to such property, and all property, real or personal, used to commit or facilitate the offenses alleged.

Substitute Assets

If any of the property described above as being subject to forfeiture, as a result of any act or omission of any defendant –

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with a third person;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 18 U.S.C. § 982(a)(4), to seek forfeiture of any other property of each defendant up to the value of the above forfeitable property, including but not limited to all property, both real and personal owned by each defendant.


By virtue of the commission of the offenses alleged in this Indictment, any and all interest that each defendant has in the above-described property is vested in and hereby forfeited to the United States.

A TRUE BILL



GRAND JURY FOREPERSON

BRIT FEATHERSTON
ACTING UNITED STATES ATTORNEY



JAY R. COMBS
Assistant United States Attorney

12-15-16
Date

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA	§	SEALED
	§	
v.	§	NO. 4:16CR
	§	Judge
JORGE LLANAS JR.	§	
a.k.a. "Georgie" (1)	§	
DANIEL ELIZONDO (2)	§	
EDUARDO ELIZONDO (3)	§	
NORA PATRICIA LOPEZ (4)	§	
LAURA LETICIA PARRA (5)	§	
ANNETTE MARTINEZ (6)	§	
LONZO ROBERTSON	§	
a.k.a. "Smiley" (7)	§	
MIA MILES (8)	§	
JACOB MORALES (9)	§	

NOTICE OF PENALTY

Count One

Violation: 21 U.S.C. § 846

Penalty: If one kilogram or more of a mixture or substance containing a detectable amount of heroin -- not less than 10 years nor more than life imprisonment, a fine not to exceed \$10 million, or both; supervised release of at least five years; if 100 grams or more but less than one kilogram of a mixture or substance containing a detectable amount of heroin – not less than 5 years nor more than 40 years imprisonment, a fine not to exceed \$5 million, or both; supervised release of at least 4 years; if less than 100 grams of a mixture or substance containing a detectable amount of heroin – not more than 20 years imprisonment, a fine not to exceed \$1 million, or both; supervised release of at least 3 years.

Special Assessment: \$100.00